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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

ARGONAUT INSURANCE COMPANY,
Plaintiff
vs.
PAYSIGN, INC., MARK R. NEWCOMER,
MARK ATTINGER, DANIEL R. HENRY,
JOAN M. HERMAN, BRUCE A. MINA,
DANIEL H. SPENCE, DENNIS TRIPLET,
and QUINN WILLIAMS,
Defendants

Case No. 2:23-cv-00713-RFB-NJK

**STIPULATION TO EXTEND TIME FOR
DEFENDANTS TO RESPOND TO
COMPLAINT**

(Third Request)

1 Pursuant to LR IA 6-1 and LR 7-1, the parties, through their respective counsel, stipulate
 2 to extend the time for Defendants to file their response to Plaintiff's Complaint for Declaratory
 3 Relief (ECF No. 1). The parties submit that good cause exists for this stipulation based on the
 4 following:

- 5 1. Plaintiff filed its Complaint on May 5, 2023 (ECF No. 1).
- 6 2. The Complaint was served on defendant Paysign, Inc. on or about June 7, 2023.
- 7 3. Subsequent to this initial service, attorney Brian G. Friel, who represents Paysign,
 8 Inc., advised that his office will be among the attorneys representing all Defendants, and agreed to
 9 accept service of the Complaint on behalf of all remaining unserved Defendants.

10 4. As part of this procedural cooperation between the parties, the parties initially
 11 agreed that all Defendants will have until July 28, 2023 to respond to the Complaint, and the parties
 12 submitted a stipulation to this effect (ECF No. 17).

13 5. Since that time, the parties have been actively engaged in discussions regarding
 14 the merits of the issues raised in the Complaint in an attempt to avoid the time and expense of further
 15 litigation. To facilitate these ongoing discussions, the parties agreed that an additional 30-day
 16 extension for Defendants to respond to the Complaint would be mutually beneficial. The parties
 17 stipulated to this extension, which provided Defendants with an extension to respond to the
 18 Complaint to August 28, 2023. (ECF No. 19).

19 6. The parties continue to actively engage in settlement discussions. However, an
 20 agreement has not yet been reached. The parties agree that an additional 30-day extension will be
 21 mutually beneficial to continue to facilitate the ongoing settlement dialogue. The parties therefore
 22 agree and respectfully submit that good cause exists for an additional 30-day extension, or to
 23 September 27, 2023, for Defendants to respond to the Complaint.

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1 7. This stipulation constitutes the parties' third requested extension of time.
2

3 Dated this 23rd day of August, 2023

Dated this 23rd day of August, 2023

4 LEWIS BRISBOIS BISGAARD & SMITH LLP

5 LEMONS, GRUNDY & EISENBERG, PC

6 /s/ Jeffrey D. Olster

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10 ARGONAUT INSURANCE COMPANY

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HERMAN, BRUCE A. MINA, DANIEL H.
SPENCE, DENNIS TRIPLETT and QUINN
WILLIAMS

15 IT IS SO ORDERED:

16 
17 UNITED STATES MAGISTRATE JUDGE

18 DATED: August 24, 2023